

SULAIMAN LAW GROUP, LTD.

Joseph S. Davidson (Admitted Pro Hac Vice)
2500 South Highland Avenue
Suite 200
Lombard, Illinois 60148
Telephone: 630-575-8181
Facsimile: 630-581-8188
E-Mail: jdavidson@sulaimanlaw.com
Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Case No. 2:18-cv-10000-SJO-PLA

RODNEY HANNAH,

Plaintiff,

v.

JPL RECOVERY SOLUTIONS, LLC,

Defendant.

**REQUEST FOR ENTRY OF DEFAULT;
DECLARATION IN SUPPORT THEREOF**

In accordance with Fed. R. Civ. P. 55(a), Plaintiff, RODNEY HANNAH, hereby requests that default be entered against Defendant, JPL RECOVERY SOLUTIONS, LLC, for failure to plead or otherwise defend.

Dated this 4th day of February, 2019

Respectfully submitted,

RODNEY HANNAH

By: /s/ Joseph S. Davidson

Joseph S. Davidson
SULAIMAN LAW GROUP, LTD.
2500 South Highland Avenue
Suite 200
Lombard, Illinois 60148
+1 630-575-8181
jdavidson@sulaimanlaw.com

Nicholas M. Wajda
WAJDA LAW GROUP, APC
11400 West Olympic Boulevard

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Suite 200M
Los Angeles, California 90064
+1 310-997-0471
nick@wajdalawgroup.com

DECLARATION

JOSEPH S. DAVIDSON, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746(2) that the following statements are true and correct:

1. That I am an attorney for the Plaintiff, RODNEY HANNAH, and in that capacity am responsible to represent the interest of Plaintiff in the above captioned matter.

2. I hereby make application to the Clerk of this Court for entry of default as to defendant JPL Recovery Services, LLC, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, and in support of this application do show that:

A. The defendant was personally served on December 28, 2018, through its Registered Agent, with copies of Plaintiff's Summons and Complaint as provided by Rule 4(c)(1) of the Federal Rules of Civil Procedure;

B. Upon Plaintiff's information and belief, the defendant, being a New York limited liability company with its principal place of business in Getzville, New York, is neither an infant nor an incompetent person requiring special service in accordance with Rule 4(g) of the Federal Rules of Civil Procedure, and is not serving with the armed forces of the United States entitled to the protection of 50 U.S.C. App. § 520;

C. The defendant has neither answered nor otherwise responded formally to the Plaintiff's Summons and Complaint, and the time to do so, as provided in Rule 12(a) of the Federal Rules of Civil Procedure, has expired;

1 D. Copies of this Declaration and the Request, seeking entry of default, which
2 are being filed herewith, have this date been served upon the defendant by
3 regular mail, postage prepaid.
4

5 FURTHER AFFIANT SAYETH NOT.

6 Joseph Davidson
JOSEPH S. DAVIDSON

7 SUBSCRIBED AND SWORN to
8 before me this 4th day of February,
9 2019.

10 Kiran Wadia
NOTARY PUBLIC

